

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,	*	
	*	
Plaintiff,	*	
	*	
v.	*	CASE NO. 2:06-CV-00116-MEF
	*	
FIVE HUNDRED FORTY-THREE	*	
THOUSAND ONE HUNDRED NINETY	*	
DOLLARS (\$543,190.00 in United States	*	
Currency	*	
Defendant.	*	
and	*	
	*	
ENRIQUE ALCARAZ-BARAJAS,	*	
	*	
Claimant.	*	

MOTION FOR EXPANSION OF TIME TO FILE SUPPORTING DOCUMENTS

Comes now the Claimant Enrique Alcaraz-Barajas, by and through the undersigned attorney, and moves the Court to grant him an expansion of time to file supporting documents as to the Motions for Summary Judgment and to Claimant's Motions to Suppress, and as grounds therefor says as follows:

1. That Claimant took the deposition of Trooper Andy Sutley on October 3, 2007.

2 Trooper Sutley brought with him an attorney to represent him personally. At the outset of the deposition, Sutley and his attorney discussed the matter of whether Sutley would exercise his right to review, make changes in form or substance, and sign the deposition, pursuant to Rule 30 (e), F.R.C.P. Trooper Sutley exercised that option and, thus, the transcript of such deposition, and any changes, will not be available in final form for at least 30 days.

3 Claimant may have additional evidence to offer in light of any changes. Additionally, Claimant desires to offer certain additional evidence via affidavit in light of Trooper Sutley's testimony. Claimant is in Mexico, as described in Claimant's original Motion

to Dismiss, and cannot come to this country to testify. The process of presenting his side of the issues is, thus, a much slower one.

WHEREFORE, premises considered, Claimant requests an additional 45 days to file additional documents relating to all pending motions. Claimant does not, however, request a delay in trial of this cause and desires the trial to be held under the current schedule.

s/Bruce Maddox
Bruce Maddox (MAD013)
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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of October, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to appropriate parties.

s/Bruce Maddox
Of Counsel